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CHICAGO TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

U.S. BANK NATIONAL ASSOCIATION,  
AS TRUSTEE FOR GSAA HOME EQUITY  
TRUST 2006-20, ASSET-BACKED  
CERTIFICATES, SERIES 2006-20.

Plaintiff.

vs

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.

## Defendants.

Case No.: 2:21-cv-00257-JAD-EJY

**STIPULATION AND  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO RENEWED MOTION FOR  
REMAND [ECF No. 291]**

## **(First Request)**

EARLY 28  
SULLIVAN  
WRIGHT  
GIZER &  
MCRAE LLP  
ATTORNEYS AT LAW

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 16, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-832212-C [ECF No. 1-1];
2. On February 16, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10];
4. On July 23, 2021, the Court entered an order, pursuant to the Parties' stipulation, staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the "Wells Fargo II Appeal"). Upon entry of the stay the Court terminated all active motions. The Court further ordered that the Parties to move to lift the stay, reopen the case, and reactivate any previously filed motions within 30 days of issuance of the mandate in the *Wells Fargo II Appeal* [ECF No. 27];
5. On December 28, 2021, U.S. Bank filed a Renewed Motion for Remand;
6. Chicago Title's deadline to respond to U.S. Bank's Renewed Motion for Remand is currently January 11, 2022;
7. Chicago Title's counsel is requesting an extension until February 9, 2022, to file its response to the pending Renewed Motion for Remand;
8. Chicago Title requests a brief extension of time to respond to the Motion for Remand to afford Chicago Title additional time to respond to the legal arguments set forth in U.S. Bank's motion;
9. U.S. Bank does not oppose the requested extension;
10. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 29] is hereby extended through and including February 9, 2022.  
3

4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

6 By: /s/-- Sophia S. Lau  
7 SCOTT E. GIZER  
8 SOPHIA S. LAU  
9 Attorneys for Defendant CHICAGO TITLE  
10 INSURANCE COMPANY

11 Dated: January 10, 2022

12 SINCLAIR BRAUN LLP

13 By: /s/-Kevin S. Sinclair  
14 KEVIN S. SINCLAIR  
15 Attorneys for Defendant CHICAGO TITLE  
16 INSURANCE COMPANY

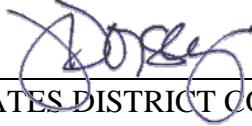
17 Dated: January 10, 2022

18 WRIGHT FINLAY & ZAK, LLP

19 By: /s/-Lindsay D. Dragon  
20 LINDSAY D. DRAGON  
21 Attorneys for Plaintiff U.S. BANK  
22 NATIONAL ASSOCIATION

23 **IT IS SO ORDERED:**

24 Dated: 1-12-2022

25 By:   
26 UNITED STATES DISTRICT COURT JUDGE